

FINAL OMB SUPPORTING STATEMENT FOR NRC FORM 4

CUMULATIVE OCCUPATIONAL EXPOSURE HISTORY

(3150-0005)

(Clearance Revision)

Description of the Information Collection

Part 20, Title 10 of the Code of Federal Regulations (10 CFR Part 20), provides requirements to licensees who receive, possess, use, transfer, or dispose of byproduct, source, or special nuclear material or who operate a production or utilization facility under parts 30 through 36, 39, 40, 50, 60, 61, 70, 72 or 76 for compliance with "Standards for Protection Against Radiation." One of the requirements stipulates that the occupational radiation exposure must be recorded by all licensees. Certain categories of NRC licensees are subject to the reporting requirements of 10 CFR 20.2206 and must report radiation exposure for individuals monitored to the NRC on an annual basis.

Pursuant to 10 CFR 20.2104 "Determination of Prior Occupational Dose," for each individual who is likely to receive, in a year, an occupational dose requiring monitoring, the licensee shall 1) determine the occupational radiation dose received during the current year, and 2) attempt to obtain the records of cumulative occupational radiation dose. To comply with these requirements the licensee may accept a written signed statement from the individual or from the individual's most recent employer as a record of the occupational dose that the individual received during the current year. The licensee may accept as a record of cumulative radiation dose an up-to-date NRC Form 4, or equivalent. The NRC Form 4 should be signed by the individual and countersigned by an appropriate official of the most recent employer for work involving radiation exposure, or the individual's current employer (if the individual is not employed by the licensee). The instructions for NRC Form 4 were revised to add a definition of "No Record." This clarification does not impact the burden per response.

A. JUSTIFICATION

1. Need for and Practical Utility of the Information Collection

The information collection was based, in part, on Presidential Guidance to Federal Agencies for Occupational Exposure published in the *Federal Register* on January 27, 1987.

In order to protect the health and safety of workers, 10 CFR Part 20 requires licensees to control, within specified limits, the occupational radiation dose. NRC Form 4 is to be completed and maintained by NRC licensees until their license is terminated by the Commission. The data contained on the form can be reviewed by the NRC inspectors to determine compliance with the dose-limit requirements of the NRC regulations in order to ensure the health and safety of the licensee employees.

The NRC Form 4 is a cumulative summary of the information found on NRC Form 5 submitted annually by all the licensees for individuals for whom monitoring was provided.

2. Agency Use of Information

The NRC uses the information to ensure that licensees are complying with the appropriate regulations and their license conditions in order to protect the health and safety of the workers and the public.

3. Reduction of Burden Through Information Technology

The NRC Form 4 is not required to be submitted to the NRC. It is provided to the radiation workers listing their exposure history. The NRC supplied software, Radiation Exposure Management Information Transmittal (REMIT) is available at no cost to licensees. The NRC provides technical support to users of the REMIT software which allows licensees to generate the NRC Form 4. In addition, the NRC has an automated dose history request form on the Radiation Exposure and Information Reporting System (REIRS) web site (www.reirs.com) to allow individuals and organizations to request a dose history using NRC Form 4 for individuals monitored at NRC facilities. The automated request form reduces the amount of paper needed to submit a request, and the report is sent to the requestor as a password protected e-mail attachment, thereby reducing the paper needed to respond to the request.

4. Effort to Identify Duplication and Use Similar Information

The Information Requirements Control Automated System (IRCAS) was searched and no duplication was found. There is no similar information available to the NRC.

5. Effort to Reduce Small Business Burden

The information required by NRC Form 4 is needed for the employees of small businesses as well as for employees of larger business firms to ensure that licensees comply with 10 CFR Part 20.2104. The REMIT software was designed to reduce the burden to small businesses in generating and exchanging Form 4's. The automated dose history available on the REIRS web site is particularly beneficial to small businesses who may not have the resources to obtain prior dose histories. It is not possible to reduce the burden on small businesses any further and still meet the objectives stated in A.1.

6. Consequences to Federal Program Activities if the Collection is not Conducted or is Conducted Less Frequently

The NRC Form 4 is filled in for an individual at the start of each new employment period. Less frequent collection would mean not checking doses received from previous employment. A worker could receive an occupational dose in excess of the limits of 10 CFR Part 20 if the dose from prior employment during the current year is not considered in assessing the dose a worker could receive during current employment.

7. Circumstances Which Justify Variation from OMB Guidelines

Records associated with the NRC Form 4 must be retained for the life of the NRC license in order to determine a worker's prior occupational radiation dose, as required pursuant to 10 CFR 20.2104.

8. Consultations Outside the NRC

The opportunity for public comment was published in the *Federal Register* on June 7, 2004 (69 FR 31846). No comments were received.

9. Payment or Gifts to Respondents.

Not applicable.

10. Confidentiality of Information

This information is subject to the Privacy Act of 1974 and is only available through the NRC's Privacy Act System of Records, NRC-27, REIRS.

11. Justification for Sensitive Questions

NRC Form 4 specifies the use of the individual's name, social security number or other ID, date of birth, and sex. This information is necessary to ensure the proper identification of the individual.

12. Estimate of Annual Burden

The requirement to obtain and maintain the information specified on NRC Form 4 for each individual for whom monitoring is required extends to the NRC licensees (104 reactors in commercial operation and about 4,498 NRC materials licensees). Since NRC Form 4 is filled out each time a worker changes employment during the year, the greatest burden is on licensees who utilize transient workers. In 2002, licensees required to submit annual occupational radiation exposure reports in accordance with 10 CFR 20.2206(a), utilized 24,352 transient workers. Of these workers 24,164 worked at the 104 reactor sites. The other 188 transient workers (24,352-24,164) worked at 135 materials licensees. Approximately, 0.50 hours is required to complete, review and authorize each NRC Form 4. Therefore, there is an annual burden of 12,082 hours for reactor sites, (24,164 transient workers x 0.5 hour/transient worker), and 94 hours for materials licensees (188 transient workers x 0.5 hour/transient worker) for a total annual burden of 12,176 hours. The annual cost to reactor sites for this requirement is \$1,896,874 (12,082 hours x \$157/hour) and \$14,758 (94 hours x \$157/hour) for materials licensees. The total annual cost to licensees is \$1,911,632 (see Table 1).

13. Estimate of Other Additional Cost.

Not applicable.

14. Estimated Annualized Cost to the NRC

NRC cost is incurred by inspectors reviewing the information on NRC Form 4, or its equivalent, and supporting records maintained by licensees. Annually, 104 hours of inspection time is spent reviewing such records, at an average of 1 hour for each 104 sites. In addition, 450 hours of inspection time is spent reviewing these records at an average of 0.1 hours for each of the 4,498 materials licensees. Annually, the total time spent reviewing these records is approximately 554 hours. The annual cost for reactor inspections to review these forms is \$16,328 (104 hours x \$157) and the annual cost for materials inspections to review these forms is \$70,650 (450 hours x \$157). Annually the total inspection cost is approximately \$86,987 (see Table 2). These costs are fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and 171.

15. Reasons for Change in Burden

The estimated burden has increased by 645 hours from 11,531 hours to 12,176 hours due to the increase of 1,275 transient workers from 23,077 to 24,352. There was a reduction in the number of materials licenses recordkeepers from 182 to 135, due primarily to a combination of 2 new Agreement States and the merger, acquisition and business failures of existing materials licenses.

16. Publication for Statistical Use

None.

17. Reason for Not Displaying the Expiration Date.

The requirement will be contained in a regulation. Amending the Code of Federal Regulations to display information that, in an annual publication, could become out of date would confuse the public.

18. Exceptions to the Certification Statement.

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not employed in the collection of information.

TABLE 1
RECORDKEEPING BURDEN
ASSOCIATED WITH NRC FORM 4

NUMBER OF RECORDKEEPERS		NUMBER OF RECORDS/ RECORDKEEPERS	NUMBER OF RECORDS	BURDEN HOURS/ RECORDS	ANNUAL BURDEN HOURS	ANNUAL COST@ \$157/HR
Reactors	104	232.34	24,164	0.50	12,082	\$1,896,874
Materials	135	1.39	188	0.50	94	\$14,758
Totals	239		24,352		12,176	\$1,911,632

TABLE 2
ESTIMATED ANNUALIZED COST TO THE NRC
FOR REVIEW OF REPORTS AND INSPECTIONS
ASSOCIATED WITH NRC FORM 4

NUMBER OF RESPONDENTS		STAFF HOURS PER LICENSEE	STAFF BURDEN HOURS	ANNUAL COST@ \$157/HR
Reactors	104	1.0	104	\$16,328
Materials	4,498	0.1	450	\$70,650
Totals	4,602		554	\$86,978

U. S. NUCLEAR REGULATORY COMMISSION

Agency Information Collection Activities: Submission for the Office of Management and Budget (OMB) Review; Comment Request

AGENCY: U. S. Nuclear Regulatory Commission (NRC)

ACTION: Notice of the OMB review of information collection and solicitation of public comment.

SUMMARY: The NRC has recently submitted to OMB for review the following proposal for the collection of information under the provisions of the Paperwork Reduction Act of 1995 (44 U.S.C. Chapter 35). The NRC hereby informs potential respondents that an agency may not conduct or sponsor, and that a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

1. Type of submission, new, revision, or extension: Revision
2. The title of the information collection: NRC Form 4, "Cumulative Occupational Dose History" and
NRC Form 5, "Occupational Exposure Record for a Monitoring Period"

3. The form number if applicable: NRC Form 4 (3150-0005); NRC Form 5 (3150-0006)
4. How often the collection is required: NRC Form 4: Occasionally
NRC Form 5: Annually
5. Who will be required or asked to report: NRC licensees who are required to comply with 10 CFR Part 20.
6. An estimate of the number of annual responses: NRC Form 4: 24,352 (24,164 from reactor licensees and 188 from materials licensees); NRC Form 5: 175,456 (161,396 from reactor licensees and 14,060 from materials licensees)
7. The estimated number of annual respondents: NRC Form 4: 239 (104 reactor sites and 135 materials licensees); NRC Form 5: 4,602 (104 reactor and 135 materials licensees, plus an additional 4,363 materials licensees recordkeepers).
8. An estimate of the total number of hours needed annually to complete the requirement or request: NRC Form 4: 12,176 hours or an average of 0.5 hours per response; NRC Form 5: 67,460 hours (57,900 hours for recordkeeping or an average of 0.33 hours per record and 9,560 hours for reporting or an average of 40 hours per licensee)

9. An indication of whether Section 3507(d), Pub. L. 104-13 applies: Not applicable.
10. Abstract: NRC Form 4 is used to record the summary of an individual's cumulative occupational radiation dose up to and including the current year to ensure that the dose does not exceed regulatory limits.

NRC Form 5 is used to record and report the results of individual monitoring for occupational radiation exposure during a one-year (calendar year) period to ensure regulatory compliance with annual radiation dose limits.

A copy of the final supporting statement may be viewed free of charge at the NRC Public Document Room, One White Flint North, 11555 Rockville Pike, Room O-1 F21, Rockville, MD 20852. OMB clearance requests are available at the NRC worldwide web site:

<http://www.nrc.gov/public-involve/doc-comment/omb/index.html>. The document will be available on the NRC home page site for 60 days after the signature date of this notice.

Comments and questions should be directed to the OMB reviewer listed below by (insert date 30 days after publication in the Federal Register). Comments received after this date will be considered if it is practical to do so, but assurance of consideration cannot be given to comments received after this date.

OMB Desk Officer
Office of Information and Regulatory Affairs (3150-0005 and 3150-0006)
NEOB-10202
Office of Management and Budget
Washington, DC 20503

Comments can also be submitted by telephone at (202) 395-3087.

The NRC Clearance Officer is Brenda Jo. Shelton, 301-415-7233.

Dated at Rockville, Maryland, this 12th day of August, 2004.

For the Nuclear Regulatory Commission.

/RA/
Beth St. Mary, Acting NRC Clearance Officer
Office of the Chief Information Officer

NRC FORM 4
(MM-YYYY)
10 CFR PART 20

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0005

EXPIRES: MM/DD/YYYY

CUMULATIVE OCCUPATIONAL DOSE HISTORY

Estimated burden per response to comply with this mandatory information collection request: 30 minutes. The record is used to ensure that doses to individuals do not exceed regulatory limits. This information is required to record an individual's lifetime occupational exposure to radiation to ensure that the cumulative exposure to radiation does not exceed regulatory limits. Send comments regarding the burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0005), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. NAME (LAST, FIRST, MIDDLE INITIAL)				2. IDENTIFICATION NUMBER		3. ID TYPE		4. SEX MALE <input type="checkbox"/> FEMALE <input type="checkbox"/>		5. DATE OF BIRTH (MM/DD/YYYY)	
6. MONITORING PERIOD (MM/DD/YYYY - MM/DD/YYYY)		7. LICENSEE NAME		8. LICENSE NUMBER		9. RECORD ESTIMATE <input type="checkbox"/> NO RECORD <input type="checkbox"/>		10. ROUTINE PSE <input type="checkbox"/>			
11. DDE	12. LDE	13. SDE, WB	14. SDE, ME	15. CEDE	16. CDE	17. TEDE		18. TODE			
6. MONITORING PERIOD		7. LICENSEE NAME		8. LICENSE NUMBER		9. RECORD ESTIMATE <input type="checkbox"/> NO RECORD <input type="checkbox"/>		10. ROUTINE PSE <input type="checkbox"/>			
11. DDE	12. LDE	13. SDE, WB	14. SDE, ME	15. CEDE	16. CDE	17. TEDE		18. TODE			
6. MONITORING PERIOD		7. LICENSEE NAME		8. LICENSE NUMBER		9. RECORD ESTIMATE <input type="checkbox"/> NO RECORD <input type="checkbox"/>		10. ROUTINE PSE <input type="checkbox"/>			
11. DDE	12. LDE	13. SDE, WB	14. SDE, ME	15. CEDE	16. CDE	17. TEDE		18. TODE			
6. MONITORING PERIOD		7. LICENSEE NAME		8. LICENSE NUMBER		9. RECORD ESTIMATE <input type="checkbox"/> NO RECORD <input type="checkbox"/>		10. ROUTINE PSE <input type="checkbox"/>			
11. DDE	12. LDE	13. SDE, WB	14. SDE, ME	15. CEDE	16. CDE	17. TEDE		18. TODE			
6. MONITORING PERIOD		7. LICENSEE NAME		8. LICENSE NUMBER		9. RECORD ESTIMATE <input type="checkbox"/> NO RECORD <input type="checkbox"/>		10. ROUTINE PSE <input type="checkbox"/>			
11. DDE	12. LDE	13. SDE, WB	14. SDE, ME	15. CEDE	16. CDE	17. TEDE		18. TODE			
6. MONITORING PERIOD		7. LICENSEE NAME		8. LICENSE NUMBER		9. RECORD ESTIMATE <input type="checkbox"/> NO RECORD <input type="checkbox"/>		10. ROUTINE PSE <input type="checkbox"/>			
11. DDE	12. LDE	13. SDE, WB	14. SDE, ME	15. CEDE	16. CDE	17. TEDE		18. TODE			
6. MONITORING PERIOD		7. LICENSEE NAME		8. LICENSE NUMBER		9. RECORD ESTIMATE <input type="checkbox"/> NO RECORD <input type="checkbox"/>		10. ROUTINE PSE <input type="checkbox"/>			
11. DDE	12. LDE	13. SDE, WB	14. SDE, ME	15. CEDE	16. CDE	17. TEDE		18. TODE			
19. SIGNATURE OF MONITORED INDIVIDUAL		20. DATE SIGNED		21. CERTIFYING ORGANIZATION		22. SIGNATURE OF DESIGNEE			23. DATE SIGNED		

INSTRUCTIONS AND ADDITIONAL INFORMATION PERTINENT TO THE COMPLETION OF NRC FORM 4 (All doses should be stated in rems)		PRIVACY ACT STATEMENT
<p>1. Type or print the full name of the monitored individual in the order of last name (include "Jr," "Sr," "III," etc.), first name, middle initial (if applicable).</p> <p>2. Enter the individual's identification number, including punctuation. This number should be the 9-digit social security number if at all possible. If the individual has no social security number, enter the number from another official identification such as a passport or work permit.</p> <p>3. Enter the code for the type of identification used as shown below:</p> <p><u>CODE ID TYPE</u></p> <p>SSN U.S. Social Security Number PPN Passport Number CSI Canadian Social Insurance Number WPN Work Permit Number PADS PADS Identification Number OTH Other</p> <p>4. Check the box that denotes the sex of the individual being monitored.</p> <p>5. Enter the date of birth of the individual being monitored in the format MM/DD/YYYY.</p> <p>6. Enter the monitoring period for which this report is filed. The format should be MM/DD/YYYY - MM/DD/YYYY.</p> <p>7. Enter the name of the licensee or facility not licensed by NRC that provided monitoring.</p> <p>8. Enter the NRC license number or numbers.</p> <p>9. Place an "X" in Record, Estimate, or No Record. Choose "Record" if the dose data listed represent a final determination of the dose received to the best of the licensee's knowledge. Choose "Estimate" only if the listed dose data are preliminary and will be superseded by a final determination resulting in a subsequent report. An example of such an instance would be dose data based on self-reading dosimeter results and the licensee intends to assign the record dose on the basis of TLD results that are not yet available. If the individual or an organization has indicated that the individual was monitored, but the monitoring records could not be obtained, enter "No Record" for this monitoring period. The individual would not be available for a PSE. For monitoring periods during the current year where records are not available, reduce the individual's allowable dose by 1.25 rems for each quarter for which records were unavailable as required by 10 CFR 20.2104(e)(1).</p>	<p>10. Place an "X" in either Routine or PSE. Choose "Routine" if the data represent the results of monitoring for routine exposures. Choose "PSE" if the listed dose data represents the results of monitoring of planned special exposures received during the monitoring period.</p> <p>11. Enter the deep dose equivalent (DDE) to the whole body.</p> <p>12. Enter the eye dose equivalent (LDE) recorded for the lens of the eye.</p> <p>13. Enter the shallow dose equivalent recorded for the skin of the whole body (SDE,WB).</p> <p>14. Enter the shallow dose equivalent recorded for the skin of the extremity receiving the maximum dose (SDE,ME).</p> <p>15. Enter the committed effective dose equivalent (CEDE).</p> <p>16. Enter the committed dose equivalent (CDE) recorded for the maximally exposed organ.</p> <p>17. Enter the total effective dose equivalent (TEDE). The TEDE is the sum of items 11 and 15.</p> <p>18. Enter the total organ dose equivalent (TODE) for the maximally exposed organ. The TODE is the sum of items 11 and 16.</p> <p>19. Signature of the monitored individual. The signature of the monitored individual on this form indicates that the information contained on the form is complete and correct to the best of his or her knowledge.</p> <p>20. Enter the date this form was signed by the monitored individual.</p> <p>21. [OPTIONAL] Enter the name of the licensee or facility not licensed by NRC, providing monitoring for exposure to radiation (such as a DOE facility) or the employer if the individual is not employed by the licensee and the employer chooses to maintain exposure records for its employees.</p> <p>22. [OPTIONAL] Signature of the person designated to represent the licensee or employer entered in item 21. The licensee or employer who chooses to countersign the form should have on file documentation of all the information on the NRC Form 4 being signed.</p> <p>23. [OPTIONAL] Enter the date this form was signed by the designated representative.</p>	<p>Pursuant to 5 U.S.C. 552a(e)(3), enacted into law by Section 3 of the Privacy Act of 1974 (Public Law 93-579), the following statement is furnished to individuals who supply information to the U.S. Nuclear Regulatory Commission (NRC) on NRC Form 4. This information is maintained in a system of records designated as NRC-27 and described at 67 Federal Register 63793 (October 15, 2002), or the most recent Federal Register publication of the NRC's "Republication of Systems of Records Notices" that is available at the NRC Public Document Room, 11555 Rockville Pike, Rockville, Maryland or located in NRC's Agencywide Documents Access and Management System (ADAMS).</p> <p>1. AUTHORITY: 42 U.S.C. 2073, 2093, 2095, 2111, 2133, 2134, and 2201(o) (1992); 10 CFR 20.2106, 20.2201-20.2204, and 20.2206 (2002); Executive Order 9397, November 22, 1943.</p> <p>2. PRINCIPAL PURPOSE(S): The information is used by the NRC in its evaluation of the risk of radiation exposure associated with the licensed activity and in exercising its statutory responsibility to monitor and regulate the safety and health practices of its licensees. The data permits a meaningful comparison of both current and long-term exposure experience among types of licensees and among licensees within each type. Data on your exposure to radiation is available to you upon your request.</p> <p>3. ROUTINE USE(S): The information may be used to provide data to other Federal and State agencies involved in monitoring and/or evaluating radiation exposure received by individuals monitored for radiation exposure while employed by or visiting or temporarily assigned to certain NRC licensed facilities; to return data provided by licensee upon request. The information may also be disclosed to an appropriate Federal, State, local or Foreign agency in the event the information indicates a violation or potential violation of law and in the course of an administrative or judicial proceeding. In addition, this information may be transferred to an appropriate Federal, State, local and Foreign agency to the extent relevant and necessary for an NRC decision about you or to the extent relevant and necessary for that agency's decision about you. Information from this form may also be disclosed, in the course of discovery and in presenting evidence, to a Congressional office to respond to their inquiry made at your request, or to NRC-paid experts, consultants, and others under contract with the NRC, on a need-to-know basis.</p> <p>4. WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL OF NOT PROVIDING INFORMATION: It is voluntary that you furnish the requested information, including social security number (identification number). The social security number is used to assure that NRC has an accurate identifier not subject to the coincidence of similar names or birth dates among the large number of persons on who data is maintained and to assure that there are no missed doses or monitoring periods and an individual gets a complete dose history when requested. The licensee must complete NRC Form 5 on each individual for whom personnel monitoring is required under 10 CFR 20.2106. Failure to do so may subject the licensee to enforcement action in accordance with 10 CFR 20.2401.</p> <p>5. SYSTEM MANAGER(S) AND ADDRESS: REIRS Project Manager, Radiation Protection, Environmental Risk, and Waste Management Branch, Division of Systems Analysis and Regulatory Effectiveness, Office of Nuclear Regulatory Research, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.</p>